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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

-----X  
MALIBU MEDIA, LLC,

Plaintiff,

vs.

JOHN DOE subscriber assigned IP address  
96.56.9.115,

Defendant.  
-----X

**CV 15-3503**  
Civil Action No. \_\_\_\_\_

**COMPLAINT – ACTION FOR  
DAMAGES FOR PROPERTY  
RIGHTS INFRINGEMENT**

**AZRACK, J.**

**SHIELDS, M.J.**

Plaintiff, Malibu Media, LLC, sues Defendant John Doe subscriber assigned IP address  
96.56.9.115, and alleges:

**Introduction**

1. This matter arises under the United States Copyright Act of 1976, as amended, 17  
U.S.C. §§ 101 et seq. (the “Copyright Act”).

2. Defendant is a persistent online infringer of Plaintiff’s copyrights. Indeed,  
Defendant’s IP address as set forth on Exhibit A was used to illegally distribute each of the  
copyrighted movies set forth on Exhibit B.

3. Plaintiff is the registered owner of the copyrights set forth on Exhibit B (the  
“Copyrights-in-Suit”).

**Jurisdiction And Venue**

4. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §  
1331 (federal question); and 28 U.S.C. § 1338 (patents, copyrights, trademarks and unfair  
competition).

5. Plaintiff used proven IP address geolocation technology which has consistently worked in similar cases to ensure that the Defendant's acts of copyright infringement occurred using an Internet Protocol address ("IP address") traced to a physical address located within this District, and therefore this Court has personal jurisdiction over the Defendant because (i) Defendant committed the tortious conduct alleged in this Complaint in this State, and (ii) Defendant resides in this State and/or (iii) Defendant has engaged in substantial and not isolated business activity in this State.

6. Based upon experience filing over 1,000 cases the geolocation technology used by Plaintiff has proven to be accurate to the District level in over 99% of the cases.

7. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) and (c), because: (i) a substantial part of the events or omissions giving rise to the claims occurred in this District; and, (ii) the Defendant resides (and therefore can be found) in this District and resides in this State; additionally, venue is proper in this District pursuant 28 U.S.C. § 1400(a) (venue for copyright cases) because Defendant or Defendant's agent resides or may be found in this District.

#### **Parties**

8. Plaintiff, Malibu Media, LLC, (d/b/a "X-Art.com") is a limited liability company organized and existing under the laws of the State of California and has its principal place of business located at 409 W. Olympic Blvd., Suite 501, Los Angeles, CA, 90015.

9. Plaintiff only knows Defendant by his, her or its IP Address. Defendant's IP address is set forth on Exhibit A.

10. Defendant's Internet Service Provider can identify the Defendant.

### **Factual Background**

#### **I. Defendant Used the BitTorrent File Distribution Network To Infringe Plaintiff's Copyrights**

11. The BitTorrent file distribution network ("BitTorrent") is one of the most common peer-to-peer file sharing systems used for distributing large amounts of data, including, but not limited to, digital movie files.

12. BitTorrent's popularity stems from the ability of users to directly interact with each other in order to distribute a large file without creating a heavy load on any individual source computer and/or network. The methodology of BitTorrent allows users to interact directly with each other, thus avoiding the need for intermediary host websites which are subject to DMCA take down notices and potential regulatory enforcement actions.

13. In order to distribute a large file, the BitTorrent protocol breaks a file into many small pieces called bits. Users then exchange these small bits among each other instead of attempting to distribute a much larger digital file.

14. After the infringer receives all of the bits of a digital media file, the infringer's BitTorrent client software reassembles the bits so that the file may be opened and utilized.

15. Each bit of a BitTorrent file is assigned a unique cryptographic hash value.

16. The cryptographic hash value of the bit ("bit hash") acts as that bit's unique digital fingerprint. Every digital file has one single possible cryptographic hash value correlating to it. The BitTorrent protocol utilizes cryptographic hash values to ensure each bit is properly routed amongst BitTorrent users as they engage in file sharing.

17. The entirety of the digital media file also has a unique cryptographic hash value ("file hash"), which acts as a digital fingerprint identifying the digital media file (e.g. a movie). Once infringers complete downloading all bits which comprise a digital media file, the

BitTorrent software uses the file hash to determine that the file is complete and accurate.

18. Plaintiff's investigator, IPP International UG, established a direct TCP/IP connection with the Defendant's IP address as set forth on Exhibit A.

19. IPP International UG downloaded from Defendant one or more bits of each of the digital movie files identified by the file hashes on Exhibit A.

20. Defendant downloaded, copied, and distributed a complete copy of Plaintiff's movies without authorization as enumerated on Exhibit A.

21. Each of the cryptographic file hashes as set forth on Exhibit A correlates to a copyrighted movie owned by Plaintiff as identified on Exhibit B.

22. IPP International UG downloaded from Defendant one or more bits of each file hash listed on Exhibit A. IPP International UG further downloaded a full copy of each file hash from the BitTorrent file distribution network and confirmed through independent calculation that the file hash matched what is listed on Exhibit A. IPP International UG then verified that the digital media file correlating to each file hash listed on Exhibit A contained a copy of a movie which is identical (or alternatively, strikingly similar or substantially similar) to the movie associated with that file hash on Exhibit A. At no time did IPP International UG upload Plaintiff's copyrighted content to any other BitTorrent user.

23. IPP International UG connected, over a course of time, with Defendant's IP address for each hash value as listed on Exhibit A. The most recent TCP/IP connection between IPP and the Defendant's IP address for each file hash value listed on Exhibit A is included within the column labeled Hit Date UTC. UTC refers to Universal Time which is utilized for air traffic control as well as for computer forensic purposes.

24. An overview of the Copyrights-in-Suit, including each hit date, date of first

publication, registration date, and registration number issued by the United States Copyright Office is set forth on Exhibit B.

25. Plaintiff's evidence establishes that Defendant is a habitual and persistent BitTorrent user and copyright infringer.

**Miscellaneous**

26. All conditions precedent to bringing this action have occurred or been waived.

27. Plaintiff has retained counsel and is obligated to pay said counsel a reasonable fee for its services.

**COUNT I**  
**Direct Infringement Against Defendant**

28. The allegations contained in paragraphs 1-27 are hereby re-alleged as if fully set forth herein.

29. Plaintiff is the owner of the Copyrights-in-Suit, as outlined in Exhibit B, each of which covers an original work of authorship.

30. By using BitTorrent, Defendant copied and distributed the constituent elements of each of the original works covered by the Copyrights-in-Suit.

31. Plaintiff did not authorize, permit or consent to Defendant's distribution of its works.

32. As a result of the foregoing, Defendant violated Plaintiff's exclusive right to:

(A) Reproduce the works in copies, in violation of 17 U.S.C. §§ 106(1) and 501;

(B) Redistribute copies of the works to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501;

(C) Perform the copyrighted works, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the works' images in any sequence and/or by making the sounds accompanying the

works audible and transmitting said performance of the works, by means of a device or process, to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definitions of "perform" and "publically" perform); and

(D) Display the copyrighted works, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the works nonsequentially and transmitting said display of the works by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publically" display).

33. Defendant's infringements were committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

WHEREFORE, Plaintiff respectfully requests that the Court:

(A) Permanently enjoin Defendant and all other persons who are in active concert or participation with Defendant from continuing to infringe Plaintiff's copyrighted works;

(B) Order that Defendant delete and permanently remove the digital media files relating to Plaintiff's works from each of the computers under Defendant's possession, custody or control;

(C) Order that Defendant delete and permanently remove the infringing copies of the works Defendant has on computers under Defendant's possession, custody or control;

(D) Award Plaintiff statutory damages per infringed work pursuant to 17 U.S.C. § 504 (a) and (c);

(E) Award Plaintiff its reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

(F) Grant Plaintiff any other and further relief this Court deems just and proper.

**DEMAND FOR A JURY TRIAL**

Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully submitted

By: /s/ Jacqueline M. James  
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*Attorneys for Plaintiff*

## File Hashes for IP Address 96.56.9.115

ISP: Optimum Online High Speed Internet Service

Physical Location: Deer Park, NY

Hit Date UTC	File Hash	Title
04/20/2015 16:17:32	07B3A42CD8005257D89CE68D5C7CC0E51A3F31C2	Do Not Keep Me Waiting Part #1
03/25/2015 20:18:43	F3C42A1DA3AB954C4FF8BACE354EA85BF6E5C277	Do Me Darling
01/07/2015 19:16:15	2B3F8791AF2DD858A42CCD8009B42E0D9B3A066D	Introducing Maya
12/29/2014 20:08:56	5F9AB1EB251770A2951DCFAF83DB394DB766AFB6	East Meets West
12/29/2014 20:06:49	C64DEA736450FEA13E4D1EF511AFA4FB72751F7F	Pure Aubrey
12/29/2014 20:00:55	1887FB6329626BA5D4E65F4E46763F036A1FAF62	Under My Blanket
12/29/2014 19:53:03	CDE85167C6031A0E6C62EB0B674787EE6BD9933D	Never Better
12/29/2014 19:51:34	81A748B2F18C7B086DDF9356921F30955A0D78E2	Strawberry Morning
12/08/2014 16:51:56	05C43A070FA4C111DC35DD2813495BCDAEF38B75	Forever You Part #2
12/08/2014 16:45:16	3D990A8BAC8FB5B10FCC9CDA739DC9FDB486876C	Too Hot To Handle
12/08/2014 16:44:38	D54A287D57980AB53CBDAAEBD54863F68E264ADA	Forever You Part #1
12/08/2014 16:33:58	E831A89E2D4F31484BA5A262CF963D9A7F414765	Light My Fire
12/08/2014 16:18:36	4EF002FE7CF11A23116C9185DC9B96D1CB1528F6	I Want You To Want Me
12/08/2014 16:17:21	4B021FAFCAB6E6AB3C5F0B085191537B7E5D8E54	Still Mine
11/25/2014 18:52:37	D2CD93D4D495BC086BCE93073D261E956A2434AB	Tight and Wet
11/17/2014 18:14:32	6A41AC32DF3FC6045B0C84A19DC4853A0177B381	Spellbound
11/17/2014 17:38:39	FA80D5A214B5A512D30439F97B44E82FD1B2C9E8	Deep Down In Me
11/12/2014 23:13:34	465226AEB68D1C06A267460BF10EB922474B246B	Luminated Emotions
11/12/2014 23:13:22	A8370645ABB66B9F7554A4B38CC4A80E800768F0	Summertime
11/12/2014 23:12:34	2A4D7C0AB461F59DD1C2844E46EC241A16C3560A	Sapphically Sexy
11/03/2014 16:57:18	42F6E9D692828F3390DC2185CDBEEC69C714EF87	Submissive Seduction
11/03/2014 16:49:57	CA0188AB037D7DA8695B4DC7BF956BA688EB6638	Sunset Memories

EXHIBIT A

ENY65



Hit Date UTC	File Hash	Title
11/03/2014 16:36:58	5B3E735FEC92E9FF2521A365DEBB8F20CB1920DD	One Show For Each
10/20/2014 14:01:31	85957A8702E1D45316CC325868D40DDA1326F63F	A Cloudy Hot Day
10/20/2014 13:49:31	DEAF7DE6746EF2174FB03709EDD7930638380FA7	Dripping Desires
10/15/2014 18:36:26	F1B3A55E0253034B5FAAF08EB6BAFD643EBB4A9B	Double Oh Heaven
10/13/2014 16:16:05	A18BD9548A03C53E0F5D32BF2479BF9178CCBD2E	Spanish Heat
10/06/2014 15:13:53	CC8005DBAB8E926AFFFF692FA34971BD95CE5495	Kacey Jordan Does Xart
10/01/2014 18:24:40	DD4B1B31D7B83F9F4A438166D7B8E5DDC30683F4	Fucking Goddesses
09/29/2014 18:47:49	9D3A9E752717EFAA4505982B80E747265E974FDB	Nice And Slow
09/29/2014 18:42:26	6302B18246EBDCDD7F7CBE8611A7C98039EDEEBC	Cat Fight
09/24/2014 02:29:56	62A046C5CD15D4800877BB24409DE3131A68A6A6	Hot Bath For Two
09/24/2014 02:20:28	BAFDF84B006186B9F2BD817653E97230B8C74D0C	Fun For Three
09/17/2014 19:08:29	E7457A133CFF1ABB455A70565294CB66D916FF91	Four Ways
09/17/2014 18:35:58	172D1AD3C4C5DCDAFD758CD362BEBB1478F7A628	Sexy and Wild
09/17/2014 18:17:14	983B4821E55EA687DC6F1C15AD435B53DC527335	Bedtime Hijinks
09/17/2014 18:11:56	44D5929CCC7172C01BB1B4C8116407EED33BF9A6	Lisas Hidden Cam
09/10/2014 17:29:43	9BB34F8EB0C9A2CD938995D5C15BB6A7C147CC40	Shes Not Alone
09/10/2014 17:24:38	CDBB0F9920593DECE1A3D43F0E8E6CF2126292B4	Our Little Cum Cottage
09/03/2014 21:25:58	2ED6829D9DA9261D8C9C4B60110134776A403C1D	Shes A Spinner
09/03/2014 21:14:01	BE684BCE129BDE8827B65645291D7B93F04675F2	Tiffanys Tight Ass
08/28/2014 22:48:36	6E0BEC2D5843622B516F57F61E5BE08EEE0FEB2F	Taste Me
08/28/2014 22:46:38	2731D60D1DC4FA8F42FBB05CC1A474B2C3B39B7B	Paint Me White
08/28/2014 22:34:58	E0D872724871BDE0097CD1B470E3C6481E8BD513	Elevated Erotica
08/28/2014 22:32:13	76BB9C51E35840423E71DC19722D1A7DC12C531E	In the blind
08/28/2014 22:31:49	82FAC802D1BAC7FFD6DF04D2BF87B0C47978A616	Angelica means Angel
08/28/2014 22:21:33	3D03F96A8D947928CACB669C7ED7EED03EEC4017	A Dream Of You

EXHIBIT A

ENY65

Hit Date UTC	File Hash	Title
08/14/2014 13:49:52	1247492A24A5E4FC9A36EAADE5308C7AFF6C49AF	Carry Me Home
08/14/2014 13:42:27	5331578B2992A448ABD6A283DDEF6639C654F7CB	Precious Metal
08/14/2014 13:06:05	4AF5B7A945F14CCEAF6B0BBD3DE1676163E2A041	Thunderstorm Love
08/14/2014 12:15:59	57C243EB3626FA2873B5642D62DE67C95650AFC1	I Want to Tell You
08/14/2014 11:01:01	10F7CDF3931A26C5713D470D8851AE0D77E7D2D8	Listen To Me Cum
08/14/2014 10:59:48	786361EC7D53CD0E6A50BD9F0F5A54DDB60A38D8	Summertime Lunch
08/14/2014 08:03:13	43D11E11172EA4301068F22EF285B67D83103574	Any And All For You
08/14/2014 07:32:15	F2A404014B130A149740F511D8DBE6F8A66237DC	Highrise Rendezvous
08/14/2014 06:36:34	0CA78A4D74AA38D0FD4DE9B9F92B0B41733FFA01	Catching Up
08/14/2014 06:18:41	E09D511799E0D035BC6ED1F500A383F7408B18C7	Risky Business
08/13/2014 12:00:49	AE39BB805BC77C2091586ABBF9969875054EC6C0	For Your Eyes Only
08/13/2014 11:42:47	47E1D57B1326071102DD44272F0B7A0F7A7CD6A0	Breakfast At Eves
07/23/2014 17:40:55	C0B193093F20C427BC9A3FDE6136381BE1A87B9E	Rock Me Baby
07/23/2014 17:32:51	6F0C35345F672E9AF659B52026CF6099D2FB827E	Yours Forever
07/23/2014 17:19:29	7CB883A141A93B50A6BDB536F4ECDC4AA25C30D1	Tie Her Up For Me
07/23/2014 17:06:49	6CA5F002A486212AD9A0E265E6C0AFE4A3A2E681	Chloe Loves Carl Part 2
06/26/2014 00:22:30	A7655F94C8A103E73DC6552897CCF623A3E88D7D	Lovers Way
06/26/2014 00:21:28	57AFED4B1A4EDF991BA86936835610A708F80F	Coming Late
06/25/2014 23:51:49	B6B8472AB40427253CC0225993FD17B8B0905ED8	They Seem so Sweet
06/25/2014 23:39:10	B9D4CE50042DC4337CE6E769C4D4FE63157C7BD6	Enjoy My Backdoor
06/25/2014 23:05:36	FF5D96473B2158BB2A6D3AEA6C16E7DD61D46311	Dancing Romance
06/25/2014 23:04:12	14D6169A02F26B556F199318D5D88176549E6A3C	Go Down On Me
06/25/2014 22:32:35	C61E4888A8A79D53FE488913625D7F23787DB0BE	Just Jennifer
06/25/2014 22:30:42	91D22A6F66495928D68FE6EFE63FC676FD6AC763	Hot Orgasm
06/25/2014 22:29:00	D05CB186C19360FC84FA212562B360C7FD9BF4F6	Sex With Glasses

## EXHIBIT A

ENY65

Hit Date UTC	File Hash	Title
06/02/2014 17:00:50	A5850C3A6470BB08C05CF823750ECF3A817686EA	Two By Two
06/02/2014 16:59:15	E2FB0812F2C1BDC78DB48CA92059EFEC12D8043D	Epic Love
06/02/2014 16:53:15	00C13D33EBDBEDD8A8A3E4DA68B9A33B614E20A9	Blindfold Me Baby
06/02/2014 16:45:36	1BED6A751D4E44BFFB2798BB16C9C602A913B1F2	Just Watch Part 2
06/02/2014 16:45:14	28D254BBB8DF3F45585100E8DD4C71653F8F0F44	From Three to Four Part 2
05/24/2014 17:11:18	FDA0F2DDA64E2F05B381523823EDE832EE74246F	Three Way is the Best Way
05/22/2014 16:09:20	0A03FABE8B34753DE33F854DDBC58E9540F49703	From Three to Four
05/22/2014 15:35:42	F30DFC38D86832C2252633A6967287C5ED4F1F53	A Thought of You Part 2
05/10/2014 18:30:18	3E1D8C8C67F3C45319A153F68065650466A3EF3F	Tantric Massage
05/10/2014 18:19:30	5AD7B95FFA75C4606F63B6E16A793974AC0B7567	Knock On My Door
05/10/2014 18:16:59	E4B1CB6C5E0703DF4B6866A261F22ABDDFD9F3C3	In My Living Room
04/25/2014 05:41:08	90808CE3282B56F54F47AC8BFB80705B0E00337E	Double Tease
04/25/2014 04:39:14	E12E1C91E8E64F6521394E742BDC51189B9D1671	Rendezvous
04/25/2014 04:04:53	40D6652804A7559C52E05B055EAABE34C418AC5A	Not Alone
04/06/2014 01:05:46	23E25904FFA921E91DD38E0D0EF7B1EB1A77F7E1	Lonesome Without You
04/06/2014 00:57:16	00846B89410F5161CBAC57E4158B3D75E0115C84	Floating Emotions
04/06/2014 00:31:59	E71F4094C8D4451E5852BA8B637FFE2A9467556D	My Days in Rome
03/27/2014 15:23:52	568DFC435ACFEA9BB0C6A1E7435D97D073731A63	Remembering Strawberry Wine
03/27/2014 15:23:32	9EAFBC0A07CD85F998D30C6831EE4BD769F2A4DD	Sweet Surrender
03/27/2014 15:02:32	18A573AF59D061A22D498B0157236803201A07C4	Deep Blue Passion
03/27/2014 15:02:13	E4B9563A541CC4D79B87E998F47874B0352ED631	Insanely Gorgeous
03/27/2014 14:57:29	597B0F364B3D469F8CE7B03C0CC30AB4F1EED98E	Fashion Fantasy
02/11/2014 16:05:51	50930D439A05CE372CB069D7FBD367826D374E6C	They Only Look Innocent
02/11/2014 12:38:46	15036C97E11F054B35EC4B131F7749469238B4B3	Season of Love
02/11/2014 11:57:44	075F4C7EE0EA4929091035DD533F85D5BB120D6F	It Has Always Been You

EXHIBIT A

ENY65

Hit Date UTC	File Hash	Title
02/11/2014 08:55:11	F65D753A4E70B1B0F29CBC39AE7E9456853FF65E	Pretty Little Belle
02/11/2014 05:45:00	5320BFD3FB93A574ACF86561A72115E9AD79320C	I Can Not Wait
02/11/2014 04:12:15	85824F61826256A4B313709DE2F1F5990AEDDCB2	So Young
02/10/2014 22:09:57	29B7F74C41FE5D866E33F2F164810C7274B50307	A Hot Number
02/10/2014 20:57:56	18DC1288637E25D7B7C9976734A7CA9C79C6C7C9	Get Wild at Home
01/17/2014 22:38:39	63F6690982249BA9B11FF0EFC6679C75B0E1433D	Ready for Love
01/17/2014 21:40:37	5769FE580D4CEC10B89182F0030646A9BA3C1CAA	No Turning Back Part #1
01/17/2014 19:46:47	1C0EB515DD0A64B094994B5AA6C57BAAE4EF2E1A	No Turning Back Part #2
01/17/2014 19:26:27	FADCB627414AC933AB5B3138E53EC1DDA914C9AA	Lying Around
01/17/2014 19:24:05	1C0AC43498CE3D3F6C87ADF451AB6C85F4D303F7	A Christmas Story
01/17/2014 17:10:59	FA49B213E99A2183027DE63F70EBDA6F15EF5697	A Gift from Colette
01/17/2014 15:54:55	4C8FB3CEF10089626BB2960266674052E174EC2F	Photo Finish
01/17/2014 15:46:23	57C96F715FF873727F249D5D9124A9883FEC287D	The Way I Feel
01/17/2014 14:50:42	C4C01C14C69576A79968B2F922836AD3814B7644	Playing Dress Up
01/17/2014 14:35:37	EDEF9BDAC230C7D236B811112B61E3246ED98632	Good Night Kiss
01/17/2014 14:31:56	4F8309110D236F5A477F4FD603D4628D8F7E97D2	Zeppelin on Fire
01/17/2014 14:07:46	8F39A0423379B6DC15FC78A0AE28115BDE659E93	Love at First Sight
01/17/2014 13:27:47	5164978A92B85A0E02BB83908988321A30590905	And Then There Was You
01/17/2014 11:02:30	6D3D7495DAC20722446E4104B3CE9EC43CAE3C51	Mile High Club
01/17/2014 05:46:56	45348EF0E9103BCCB0BE7DF6DE1288A55FE8FE2D	In for the Night
01/17/2014 02:43:33	9B499B104B7038B67FDE2EA459783D3DAB5DE200	Apertif Our Style
01/17/2014 01:48:18	C1CD39E7B1126E6B78509E0CD1026E1D5388C44C	Getting Ready For You
11/26/2013 20:36:39	CDDEE4024AA2882BF61FC875A18895BF8475F62F	Tease and Please
11/21/2013 22:02:24	2839C26D1ED71C71BF7F5332EC0F4E2FD3761A87	High School Dropouts
11/21/2013 21:29:48	E49530D825879725F7D2AC9D28B6E872F3B819A7	No Hurry

## EXHIBIT A

ENY65

Hit Date UTC	File Hash	Title
11/21/2013 21:08:25	CC02342113270FB7060BDE947BE60A39B7DB61F7	Blindfold Me Part #2
11/21/2013 21:00:28	804214E40F3E19E6BB1BF041223C05E2B5DBF7DC	Baby Blues
11/21/2013 20:57:28	1D6D0310DCAC9BFE62CEE13C6C79492F81E30AFF	Blindfold Me and Tie Me Up
10/31/2013 15:21:23	BC595F75F5D2747F382B845C19F4D51CCCCB5A1F	All Tied Up
10/31/2013 15:11:45	64ADCF0150EAD63FC61B661ADEDED06E5752A1C	Bohemian Rhapsody
10/31/2013 14:56:56	D472A213E03DC20772F1DE6AC982F1CDB4416344	Body Language
10/22/2013 15:57:45	72D6ABD88F08C0C704344798BF2AD4D6E12D979B	Much Needed Vacation
10/21/2013 16:28:27	904C69072414BFC3C9D1CF83F9573CDEF9A4C7E4	Grow Up With Me
10/21/2013 16:18:40	5710510F0545E569D1944B6791A908B2F72EDC6C	They Meet Again
10/15/2013 14:18:28	5289898BEC564BF698619799779E21C7EBC2BDA1	Cassie My Love
10/10/2013 20:00:32	18784DF5EEAF9473E6D8236BA8E7EF036BE88FE0	The Best Blondes
10/10/2013 19:20:10	5367E0598CBC2F58064EE0FC4DB641D2A00947F9	The Journey
10/10/2013 17:45:44	A864021C51F93C83D98B9B079AB1EC2BE3C8881D	In Charge
10/09/2013 17:37:03	22EC80C0115830E7FC0EF10CD79ADCDEFA03283B	Hot Brunettes
09/30/2013 20:11:38	5028025E8FAC072D768663F9C6CEE547212D554C	Date Night at Home
09/25/2013 21:38:10	82EC5EAAD8DA4BEB8412F645659AFB07BB93150	Love with a View
09/24/2013 16:11:18	227497A325CF7F0301DEF2410FE5C00BAFB6D856	Come from behind
09/17/2013 18:26:59	3CCB3C201AC3B4D31E1E8351B1AAE8E3343A0A45	Party Boat
09/12/2013 15:41:44	D147E7C5DC14E22DD4642EB700B6262B531923FF	Come Inside From the Cold
09/11/2013 14:46:16	82296A2E712E2BFDE3A7FF70EC402ADAEA6F211C	A Perfect Match
09/09/2013 19:02:48	680F6B0426519882FFDC454B1D08B9CC47499821	Erotic Stretching and Sex
09/03/2013 21:29:04	C388586784C4B7F79DCAB0ABC9C6DD694289E305	Malibu Moments
08/26/2013 13:29:33	8DEFB779C0FB0E97B6FD55FA1F7D1FCC1C6F9AC4	Alone Is A Dream Left Behind
08/26/2013 13:16:29	DB8DC83A365F22DEFEBDA8FAFF48F3436CEE2B72	We Love Ourselves
08/23/2013 14:29:45	84E50974FDDE4017B5823D46A53AA58370F4C845	Spontaneous

EXHIBIT A

ENY65

Hit Date UTC	File Hash	Title
08/21/2013 18:37:01	904A1DA01C4575CAB34A608694AB0072ECBD4230	I Love James Deen
08/19/2013 15:11:01	4842644E88162527E5D4D8B101BCE619983190F4	Raw Passion
08/16/2013 15:53:39	01E260D117B5C3803E0F9C150AE2F1473A9AA414	Malibu Moments Part #2
08/14/2013 21:52:59	6B3AD6CD8876E455AA4BC7F7A00D5CE42B6415D0	Triple Threat
08/08/2013 17:53:28	5529B88C2C100356DC99BEDDDF84CFD93A459812	This Really Happened
08/08/2013 17:44:03	2A936E5B37749915EEDA067A54C93CF84842BEA2	New Romance
07/29/2013 20:43:44	38807327F4A38D5C5EB50A416FB8F5909762379B	Up Close and Personal
07/28/2013 05:01:40	BBAC80DDA216B896FD1FC20C965473680905066F	Without Words
07/16/2013 19:38:27	53E8068629FC21F23779B78A42D8C8AA03DE63AB	Newlyweds
07/16/2013 19:21:12	53EAC1A555D48687120AC92F6B949F846B78D39F	Stay for a While
07/16/2013 19:20:32	07D2B5F0A3C56E400A6D71B8ABAE2AE7E7D4DED9	Still With Me
07/16/2013 19:09:34	6D61BA9F68C9A3961BAA3AFD7AF1B5C084F1B048	Wonder Waltz
07/16/2013 19:07:42	308620F5875B31DE0EF00FEAC275E9677D3D7D9A	Hot Chocolate
07/16/2013 19:02:52	BFFA463E61447F200B096D9E7120FDDB1F858CC0	Going Strong
07/01/2013 14:57:44	C16CEAC38E0C09CC468B3FBA9ADAAA34B76D6FE4	Oh Mia
06/18/2013 18:02:00	CD4DA2C56C0E981709CE713B82737E015698CF58	Play Me
06/07/2013 13:56:30	0BA70C8B952A40B372C55F8FB7BE86D9CBAE128C	Only Lorena
06/04/2013 14:55:19	B1C3606A657A831F78168DC7E66E6E94F43704F6	Good Morning Baby
04/25/2013 17:18:41	11BBD0678BDD5759E5D8BB9B0CB398ADB9A7D2E2	The Sleepover
04/22/2013 14:41:37	D40E3490DE07096BF88E98A10B5D4E0D1672F975	Fashion Models
04/18/2013 15:09:42	8D0BE09C9C7DAA1C054DD93E85AB41965BA7FCF1	Rose Petals
04/15/2013 19:27:49	52BE6E72821F484206CE299A71546B4DC23C0D28	Bottoms Up
04/12/2013 21:33:11	8703E222540294A3D0580285C1CD3750F76A60DC	Pretty Babies

Total Statutory Claims Against Defendant: 170

EXHIBIT A

ENY65



## Copyrights-In-Suit for IP Address 96.56.9.115

ISP: Optimum Online High Speed Internet Service

Location: Deer Park, NY

Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Do Not Keep Me Waiting Part #1	PA0001941283	04/14/2015	04/27/2015	04/20/2015
Do Me Darling	PA0001921297	10/24/2014	11/06/2014	03/25/2015
Introducing Maya	PA0001928429	01/05/2015	01/19/2015	01/07/2015
East Meets West	PA0001926088	12/23/2014	12/29/2014	12/29/2014
Pure Aubrey	PA0001926084	12/22/2014	12/29/2014	12/29/2014
Under My Blanket	PA0001925298	12/08/2014	12/10/2014	12/29/2014
Never Better	PA0001926087	12/26/2014	12/29/2014	12/29/2014
Strawberry Morning	PA0001926089	12/27/2014	12/29/2014	12/29/2014
Forever You Part #2	PA0001923966	11/30/2014	12/08/2014	12/08/2014
Too Hot To Handle	PA0001925345	12/02/2014	12/10/2014	12/08/2014
Forever You Part #1	PA0001923965	11/23/2014	12/08/2014	12/08/2014
Light My Fire	PA0001923961	11/28/2014	12/08/2014	12/08/2014
I Want You To Want Me	PA0001925335	12/06/2014	12/10/2014	12/08/2014
Still Mine	PA0001925346	12/04/2014	12/10/2014	12/08/2014
Tight and Wet	PA0001923176	11/19/2014	11/23/2014	11/25/2014
Spellbound	PA0001922954	11/15/2014	11/18/2014	11/17/2014
Deep Down In Me	PA0001922955	11/13/2014	11/18/2014	11/17/2014
Luminated Emotions	PA0001922275	11/11/2014	11/14/2014	11/12/2014
Summertime	PA0001922274	11/09/2014	11/14/2014	11/12/2014
Sapphically Sexy	PA0001921542	11/05/2014	11/09/2014	11/12/2014
Submissive Seduction	PA0001878420	02/07/2014	02/13/2014	11/03/2014

EXHIBIT B

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Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Sunset Memories	PA0001921296	10/31/2014	11/06/2014	11/03/2014
One Show For Each	PA0001921295	10/26/2014	11/06/2014	11/03/2014
A Cloudy Hot Day	PA0001918790	10/19/2014	10/22/2014	10/20/2014
Dripping Desires	PA0001918737	10/17/2014	10/22/2014	10/20/2014
Double Oh Heaven	PA0001918736	10/15/2014	10/22/2014	10/15/2014
Spanish Heat	PA0001917709	10/13/2014	10/19/2014	10/13/2014
Kacey Jordan Does Xart	PA0001916065	10/04/2014	10/06/2014	10/06/2014
Fucking Goddesses	PA0001916051	09/30/2014	10/06/2014	10/01/2014
Nice And Slow	PA0001916038	09/28/2014	10/06/2014	09/29/2014
Cat Fight	PA0001916043	09/26/2014	10/06/2014	09/29/2014
Hot Bath For Two	PA0001914734	09/20/2014	09/22/2014	09/24/2014
Fun For Three	PA0001914731	09/19/2014	09/22/2014	09/24/2014
Four Ways	PA0001914532	09/13/2014	09/16/2014	09/17/2014
Sexy and Wild	PA0001914530	09/15/2014	09/16/2014	09/17/2014
Bedtime Hijinks	PA0001912776	09/01/2014	09/17/2014	09/17/2014
Lisas Hidden Cam	PA0001914534	09/11/2014	09/16/2014	09/17/2014
Shes Not Alone	PA0001914535	09/09/2014	09/16/2014	09/10/2014
Our Little Cum Cottage	PA0001914537	09/05/2014	09/17/2014	09/10/2014
Shes A Spinner	PA0001914521	09/03/2014	09/17/2014	09/03/2014
Tiffanys Tight Ass	PA0001912772	08/30/2014	09/17/2014	09/03/2014
Taste Me	PA0001912773	08/27/2014	09/17/2014	08/28/2014
Paint Me White	PA0001909785	08/24/2014	08/26/2014	08/28/2014
Elevated Erotica	PA0001909513	08/17/2014	08/26/2014	08/28/2014
In the blind	PA0001909487	08/08/2014	08/20/2014	08/28/2014
Angelica means Angel	PA0001909782	08/20/2014	08/26/2014	08/28/2014

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Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
A Dream Of You	PA0001909516	08/15/2014	08/26/2014	08/28/2014
Carry Me Home	PA0001908452	07/29/2014	08/04/2014	08/14/2014
Precious Metal	PA0001908248	07/27/2014	07/31/2014	08/14/2014
Thunderstorm Love	PA0001909507	08/13/2014	08/26/2014	08/14/2014
I Want to Tell You	PA0001872082	11/27/2013	12/04/2013	08/14/2014
Listen To Me Cum	PA0001908211	07/19/2014	07/31/2014	08/14/2014
Summertime Lunch	PA0001907078	07/11/2014	07/25/2014	08/14/2014
Any And All For You	PA0001908677	08/02/2014	08/11/2014	08/14/2014
Highrise Rendezvous	PA0001908213	07/25/2014	07/31/2014	08/14/2014
Catching Up	PA0001889391	04/13/2014	04/15/2014	08/14/2014
Risky Business	PA0001878455	02/01/2014	02/18/2014	08/14/2014
For Your Eyes Only	PA0001909485	08/11/2014	08/19/2014	08/13/2014
Breakfast At Eves	PA0001909480	08/06/2014	08/26/2014	08/13/2014
Rock Me Baby	PA0001907592	07/19/2014	07/25/2014	07/23/2014
Yours Forever	PA0001907573	07/15/2014	07/25/2014	07/23/2014
Tie Her Up For Me	PA0001906551	07/03/2014	07/14/2014	07/23/2014
Chloe Loves Carl Part 2	PA0001906561	07/05/2014	07/14/2014	07/23/2014
Lovers Way	PA0001905141	06/21/2014	07/02/2014	06/26/2014
Coming Late	PA0001904286	06/19/2014	06/24/2014	06/26/2014
They Seem so Sweet	PA0001904151	06/15/2014	06/19/2014	06/25/2014
Enjoy My Backdoor	PA0001904149	06/13/2014	06/19/2014	06/25/2014
Dancing Romance	PA0001903915	06/07/2014	06/12/2014	06/25/2014
Go Down On Me	PA0001904131	06/11/2014	06/19/2014	06/25/2014
Just Jennifer	PA0001903842	06/09/2014	06/12/2014	06/25/2014
Hot Orgasm	PA0001903922	06/03/2014	06/12/2014	06/25/2014

## EXHIBIT B

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Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Sex With Glasses	PA0001903914	06/05/2014	06/12/2014	06/25/2014
Two By Two	PA0001898093	05/23/2014	06/06/2014	06/02/2014
Epic Love	PA0001898091	05/25/2014	06/06/2014	06/02/2014
Blindfold Me Baby	PA0001902971	05/30/2014	06/06/2014	06/02/2014
Just Watch Part 2	PA0001902964	05/27/2014	06/06/2014	06/02/2014
From Three to Four Part 2	PA0001902970	06/01/2014	06/06/2014	06/02/2014
Three Way is the Best Way	PA0001878426	02/04/2014	02/13/2014	05/24/2014
From Three to Four	PA0001898059	05/19/2014	06/06/2014	05/22/2014
A Thought of You Part 2	PA0001895665	05/13/2014	05/16/2014	05/22/2014
Tantric Massage	PA0001892180	04/25/2014	04/29/2014	05/10/2014
Knock On My Door	PA0001895763	05/09/2014	05/16/2014	05/10/2014
In My Living Room	PA0001895088	05/01/2014	05/12/2014	05/10/2014
Double Tease	PA0001892183	04/17/2014	04/29/2014	04/25/2014
Rendezvous	PA0001889397	04/12/2014	04/15/2014	04/25/2014
Not Alone	PA0001889410	04/09/2014	04/15/2014	04/25/2014
Lonesome Without You	PA0001887108	04/03/2014	04/07/2014	04/06/2014
Floating Emotions	PA0001887126	04/05/2014	04/07/2014	04/06/2014
My Days in Rome	PA0001886187	03/28/2014	04/02/2014	04/06/2014
Remembering Strawberry Wine	PA0001885184	03/11/2014	03/24/2014	03/27/2014
Sweet Surrender	PA0001884861	03/23/2014	03/26/2014	03/27/2014
Deep Blue Passion	PA0001885168	03/21/2014	03/24/2014	03/27/2014
Insanely Gorgeous	PA0001885205	03/19/2014	03/24/2014	03/27/2014
Fashion Fantasy	PA0001885185	03/13/2014	03/24/2014	03/27/2014
They Only Look Innocent	PA0001877471	01/24/2014	01/31/2014	02/11/2014
Season of Love	PA0001877252	01/18/2014	01/26/2014	02/11/2014

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Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
It Has Always Been You	PA0001878424	02/06/2014	02/13/2014	02/11/2014
Pretty Little Belle	PA0001878425	02/09/2014	02/13/2014	02/11/2014
I Can Not Wait	PA0001877473	01/27/2014	01/31/2014	02/11/2014
So Young	PA0001877472	01/25/2014	01/31/2014	02/11/2014
A Hot Number	PA0001878456	01/30/2014	02/18/2014	02/10/2014
Get Wild at Home	PA0001877470	01/22/2014	01/31/2014	02/10/2014
Ready for Love	PA0001872968	12/05/2013	12/07/2013	01/17/2014
No Turning Back Part #1	PA0001874524	12/21/2013	12/30/2013	01/17/2014
No Turning Back Part #2	PA0001874525	12/27/2013	12/30/2013	01/17/2014
Lying Around	PA0001872754	12/10/2013	12/15/2013	01/17/2014
A Christmas Story	PA0001874527	12/24/2013	12/30/2013	01/17/2014
A Gift from Colette	PA0001872969	12/07/2013	12/11/2013	01/17/2014
Photo Finish	PA0001874616	12/29/2013	01/05/2014	01/17/2014
The Way I Feel	PA0001874745	01/08/2014	01/15/2014	01/17/2014
Playing Dress Up	PA0001874742	01/12/2014	01/15/2014	01/17/2014
Good Night Kiss	PA0001872970	12/08/2013	12/11/2013	01/17/2014
Zeppelin on Fire	PA0001874614	01/04/2014	01/05/2014	01/17/2014
Love at First Sight	PA0001872756	12/14/2013	12/15/2013	01/17/2014
And Then There Was You	PA0001874615	12/31/2013	01/05/2014	01/17/2014
Mile High Club	PA0001877249	01/16/2014	01/26/2014	01/17/2014
In for the Night	PA0001874670	01/06/2014	01/06/2014	01/17/2014
Apertif Our Style	PA0001874522	12/23/2013	12/30/2013	01/17/2014
Getting Ready For You	PA0001874744	01/10/2014	01/15/2014	01/17/2014
Tease and Please	PA0001871937	11/23/2013	11/29/2013	11/26/2013
High School Dropouts	PA0001871934	11/21/2013	11/29/2013	11/21/2013

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Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
No Hurry	PA0001868811	11/07/2013	11/10/2013	11/21/2013
Blindfold Me Part #2	PA0001867890	11/03/2013	11/06/2013	11/21/2013
Baby Blues	PA0001867887	10/30/2013	11/03/2013	11/21/2013
Blindfold Me and Tie Me Up	PA0001867888	11/01/2013	11/03/2013	11/21/2013
All Tied Up	PA0001866077	10/19/2013	10/21/2013	10/31/2013
Bohemian Rhapsody	PA0001867584	10/23/2013	10/25/2013	10/31/2013
Body Language	PA0001868096	10/26/2013	11/01/2013	10/31/2013
Much Needed Vacation	PA0001866083	10/21/2013	10/21/2013	10/22/2013
Grow Up With Me	PA0001866185	10/17/2013	10/19/2013	10/21/2013
They Meet Again	PA0001866049	10/11/2013	10/16/2013	10/21/2013
Cassie My Love	PA0001866053	10/13/2013	10/16/2013	10/15/2013
The Best Blondes	PA0001865816	10/09/2013	10/11/2013	10/10/2013
The Journey	PA0001865603	10/07/2013	10/09/2013	10/10/2013
In Charge	PA0001865956	10/04/2013	10/06/2013	10/10/2013
Hot Brunettes	PA0001865957	10/03/2013	10/06/2013	10/09/2013
Date Night at Home	PA0001864689	09/29/2013	09/30/2013	09/30/2013
Love with a View	PA0001863369	09/25/2013	09/27/2013	09/25/2013
Come from behind	PA0001863248	09/23/2013	09/26/2013	09/24/2013
Party Boat	PA0001862485	09/15/2013	09/18/2013	09/17/2013
Come Inside From the Cold	PA0001862484	09/12/2013	09/18/2013	09/12/2013
A Perfect Match	PA0001862419	09/11/2013	09/12/2013	09/11/2013
Erotic Stretching and Sex	PA0001862293	09/08/2013	09/08/2013	09/09/2013
Malibu Moments	PA0001862283	09/03/2013	09/08/2013	09/03/2013
Alone Is A Dream Left Behind	PA0001860984	08/24/2013	09/10/2013	08/26/2013
We Love Ourselves	PA0001860944	08/26/2013	09/08/2013	08/26/2013

EXHIBIT B

ENY65

Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Spontaneous	PA0001860977	08/22/2013	09/10/2013	08/23/2013
I Love James Deen	PA0001860982	08/20/2013	09/10/2013	08/21/2013
Raw Passion	PA0001860979	08/18/2013	09/02/2013	08/19/2013
Malibu Moments Part #2	PA0001860958	08/15/2013	09/02/2013	08/16/2013
Triple Threat	PA0001860961	08/13/2013	09/02/2013	08/14/2013
This Really Happened	PA0001860970	08/03/2013	09/01/2013	08/08/2013
New Romance	PA0001860972	08/05/2013	09/03/2013	08/08/2013
Up Close and Personal	PA0001859653	07/21/2013	08/01/2013	07/29/2013
Without Words	PA0001859650	07/17/2013	08/01/2013	07/28/2013
Newlyweds	PA0001859662	07/04/2013	07/26/2013	07/16/2013
Stay for a While	PA0001859661	07/05/2013	08/02/2013	07/16/2013
Still With Me	PA0001813360	11/02/2012	11/19/2012	07/16/2013
Wonder Waltz	PA0001859655	07/15/2013	08/02/2013	07/16/2013
Hot Chocolate	PA0001859657	07/11/2013	08/02/2013	07/16/2013
Going Strong	PA0001859660	07/06/2013	08/02/2013	07/16/2013
Oh Mia	PA0001852674	06/28/2013	07/05/2013	07/01/2013
Play Me	PA0001847659	06/14/2013	06/30/2013	06/18/2013
Only Lorena	PA0001847654	06/02/2013	06/18/2013	06/07/2013
Good Morning Baby	PA0001847655	06/04/2013	06/18/2013	06/04/2013
The Sleepover	PA0001838600	04/23/2013	04/28/2013	04/25/2013
Fashion Models	PA0001838599	04/19/2013	04/28/2013	04/22/2013
Rose Petals	PA0001838598	04/17/2013	04/28/2013	04/18/2013
Bottoms Up	PA0001838596	04/13/2013	04/28/2013	04/15/2013
Pretty Babies	PA0001835953	04/05/2013	04/29/2013	04/12/2013

Total Malibu Media, LLC Copyrights Infringed: 170

EXHIBIT B

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